

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>BRIE DREW,</b>	§	
	§	
	§	
<b>Plaintiff,</b>	§	
	§	<b>C.A. No. 07-813 (GMS)</b>
<b>v.</b>	§	
	§	
<b>CORPORATION SERVICE CO., INC.</b>	§	
<b>a Delaware corporation,</b>	§	
	§	
<b>Defendant.</b>	§	

**DEFENDANT’S INITIAL DISCLOSURE STATEMENT**

COMES NOW, Defendant Corporation Service Company (“CSC” or “Defendant”), by and through undersigned counsel pursuant to Fed.R.Civ.P. 26 with these initial disclosures:

**A. Persons Reasonably Likely To Have Information That Bears Significantly On Defendant’s Defenses In This Case.**

Defendant believes that the following individuals, in addition to Plaintiff, are reasonably likely to have information that bears significantly on Defendant’s defenses in this matter. These individuals are/were managers or current employees of CSC and may be contacted through the undersigned counsel.

1. Chris Zellman

Mr. Zellman has information regarding Plaintiff’s job performance and the circumstances giving rise to her termination.

2. Susan Hudson

Ms. Hudson has information regarding Plaintiff’s job performance and the circumstances giving rise to her termination.

3. Leona Dorsey

Ms. Dorsey has information regarding Plaintiff's job performance.

4. John Fortunato

Mr. Fortunato has information regarding the circumstances giving rise to her termination.

**B. General Description Of Documents, Data, Compilations And Tangible Things In Defendant's Possession, Custody, Or Control That Are Likely To Bear Significantly On Defendant's Defenses.**

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At present, Defendant has identified the following documents, data, compilations and tangible things in their possession, custody or control that are likely to bear significantly on their defenses in this action.

1. Documents relating to Plaintiff's personnel information;
2. CSC's policies prohibiting harassment and discrimination;
3. Documents relating to Plaintiff's job performance;
4. Plaintiff's job description; and

5. Documents sent to, and received from, the U.S. Equal Employment Opportunity Commission.

**C. Computation of Damages.**

Not applicable. Defendant reserves the right to seek attorney's fees and costs should it prevail in this action.

**D. The Existence and Content Of Any Insurance Agreement That May Be Liable To Satisfy All Or Part Of Any Judgment That Is Entered In This Action Or To Indemnify Or Reimburse For Payments Made To Satisfy The Judgment.**

Defendant is currently unaware of any insurance agreements within the meaning of Rule 26(a)(1)(D) of the Federal Rules of Civil Procedure that would provide coverage in this case.

**E. Supplementation**

In accordance with Rule 26(e) of the Federal Rules of Civil Procedure, Defendant will supplement or correct the above disclosures to include information subsequently acquired if, based on that information, it is determined that the above-disclosed information is incomplete or incorrect in some material respect and if the additional or correct information is not otherwise made known to Plaintiff during the discovery process or in writing.

**F. Discovery Plan**

The parties have met to discuss this matter pursuant to Federal Rule of Civil Procedure 26(f), and intend to submit a proposed discovery plan in accordance with the Rule.

McCARTER & ENGLISH, LLP

By: /s/ Christopher A. Selzer  
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-and-

Sarah E. Bouchard, Esquire (Admitted *Pro Hac Vice*)  
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Counsel for Defendant

Dated: April 7, 2008

**CERTIFICATE OF SERVICE**

I, Christopher A. Selzer, hereby certify that on April 7, 2008 a true and correct copy of the foregoing Defendant's Initial Disclosure Statement was served via first class mail upon the following:

John M. LaRosa, Esquire  
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